

Paul R. Glassman (SBN 76536)  
STRADLING YOCCA CARLSON & RAUTH, P.C.  
10100 Santa Monica Boulevard, Suite 1400  
Los Angeles, CA 90067  
Telephone: (424) 214-7000  
Facsimile: (424) 214-7010  
Email: pglassman@sycr.com

Mia S. Brown (SBN 242268)  
General Counsel  
SOUTH SAN JOAQUIN IRRIGATION DISTRICT  
11011 E. Highway 120  
Manteca, CA 95336  
Telephone: (209) 249-4600  
Facsimile: (209) 249-4692  
Email: mbrown@ssjid.com

Attorneys for Creditor and Party-In-Interest,  
South San Joaquin Irrigation District

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In Re:**

**PG&E CORPORATION**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

Bankruptcy Case No. 19 - 30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**SOUTH SAN JOAQUIN IRRIGATION  
DISTRICT'S NOTICE REGARDING  
SPEAKING ATTORNEY AND WITNESSES  
PURSUANT TO COURT'S ORDER  
ESTABLISHING CONFIRMATION  
HEARING PROTOCOL**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Judge: Hon. Dennis Montali

Date: May 27, 2020

Time: 10:00 a.m.

Place: United States Bankruptcy Court  
450 Golden Gate Ave., 16<sup>th</sup> Flr, Crt. 17  
San Francisco, CA 94102

**TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY  
JUDGE, AND ALL PARTIES IN INTEREST:**

South San Joaquin Irrigation District (the “District”) submits this Notice in accordance with the Court’s Order Establishing Confirmation Hearing Protocol [Doc. No. 7182], which, among other things, directs that by May 22, 2020, “[a]ll parties that intend to participate at the Confirmation Hearing must provide the Court with the names and e-mail addresses of all speaking attorneys and witnesses.” The Confirmation Hearing is the hearing on confirmation of *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020 as Amended (Docket No. 6320)* (the “Plan”) filed by the debtors in these cases (“Debtors”).

On May 15, 2020, the District filed *South San Joaquin Irrigation District’s (A) Objection to Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020 as Amended (Docket No. 6320) and (B) Objection to Cure Amounts and Other Matters Pertaining to Assumption Pursuant to Section 365(b)(1) of the Bankruptcy Code (Docket No. 7037)* [Docket No. 7265] (the “Objections”).

In support of the Objections, the District filed the Declaration of Mia S. Brown [Docket No. 7364] (the “Brown Declaration”), the District’s Appendix of Excerpts of the Plan [Docket No. 7267], and the District’s Request for Judicial Notice [Docket No. 7274] (the “OJRN”). The Declarations of Peter Rietkerk [Docket No. 6081] (“Rietkerk Declaration”) and Peggy O’Laughlin [Docket No. 6082] (“O’Laughlin Declaration”) were attached to the OJRN as exhibits B and C. On May 18, 2020, the District filed its Identification of Exhibits [Docket No. 7383] in support of the Objection; those exhibits include, among other things, the Brown Declaration, Rietkerk Declaration, and O’Laughlin Declaration.

Paul Glassman (pglassman@sycr.com) will be the “speaking attorney” on behalf of the District.

The District does not anticipate the need to call witnesses at the hearing on plan confirmation at this time but reserves its right to do so and to identify additional evidence in

1 response to any pleadings, evidence, or other matters submitted by the Debtors or any other  
2 party.

3  
4 DATED: May 22, 2020

STRADLING YOCCA CARLSON & RAUTH  
A PROFESSIONAL CORPORATION

5 By: /s/ Paul R. Glassman  
6 Paul R. Glassman  
7 Attorneys for Party-in-Interest,  
8 South San Joaquin Irrigation District  
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that the attached document was properly filed on May 22, 2020 with  
3 ECF/CM system of the United States Bankruptcy Court for the Northern District of California  
4 and that a Notification of Electronic Filing of this document was sent via the ECF/CM noticing  
5 system to all ECF Registered Participants in this case.

6 Dated: May 22, 2020

/s/ Paul R. Glassman  
Paul R. Glassman